

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	
)	No.: 07 CR 00851-6
)	Honorable Judge Robert W. Gettleman
JUAN DURAN,)	
)	
Defendant.)	

**DEFENDANT’S AGREED MOTION FOR EXTENSION OF TIME
FOR FILING OF PRETRIAL MOTIONS**

The defendant, **JUAN DURAN**, by and through his attorney, **ROBERT L. RASCIA**, respectfully moves this Honorable Court to enter an order granting him an extension of time for the filing of his pretrial motions.

In support thereof the Defendant states as follows:

1. That the filing of pretrial motions in this matter is due on June 30, 2008.
2. That the defendant’s lead counsel, the undersigned, will not be available due to a family commitment in Rome, Italy. Counsel would not be back in Chicago, until July 10, 2008.
3. Counsel discussed this request with AUSA Meghan C. Morrissey. Ms. Morrissey indicated she does not oppose this request.

4. Counsel respectfully requests an extension of time to on or about July 14, 2008, for the filing of his pretrial motions.

WHEREFORE, the Defendant respectfully prays for this Honorable Court to enter an order granting an extension of time for the filing of his pretrial motions to July 14, 2008.

Respectfully Submitted,

S/Robert L. Rascia/June 26, 2008

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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CERTIFICATE OF SERVICE

I, **ROBERT L. RASCIA**, deposes and states that I have served a copy of the Defendant's Agreed Motion for Extension of Time for Filing of Pretrial Motions to Meghan C. Morrissey, Assistant United States Attorney, VIA ELECTRONICALLY FILING on this 26th day of June, 2008.

S/Robert L. Rascia/June 26, 2008

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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